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ROBERT B. STEWART
PRESIDENT

NATIONAL
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ASSOCIATION

July 17, 1998

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Department of the Interior
Minerals Management Service
Mail Stop 4024
381 Elden Street
Herndon, Virginia
Attention: Rules Processing Team (Comments)

The National Ocean Industries Association (NOIA) asks that you accept this letter as our comment on the Mineral Management Service proposed rule on Postlease Operations Safety.

NOIA is a trade association representing roughly 270 companies that are involved in all aspects of exploring for and producing the hydrocarbon resources of our nation's Outer Continental Shelf (OCS). Our membership includes major and independent producers, contractors, oil field service companies, equipment manufacturers, professional service supplies and others with a stake in the success of the federal OCS leasing and development program.

We have reviewed the extensive comments and analysis submitted to you by the American Petroleum Institute and the Offshore Operators Committee with a cover letter dated July 1, 1998. We are in support of the view expressed in those comments and wish fully endorse them. Please consider NOIA to have adopted those comments as its own. We specifically wish to associate ourselves with the recommendation that the section of the proposed rule dealing with "disqualification of operators" be dropped from the final rule.

We appreciate the opportunity to comment and your attention to our views.

Sincerely,

A handwritten signature in black ink that reads "Robert B. Stewart". The signature is written in a cursive, flowing style.

Robert B. Stewart